## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TENNESSEE GREENEVILLE DIVISION

JERRY MICHAEL PUCKETT,	,
ANDREW JOSEPH PUCKETT,	)
GEORGE ROBERT PUCKETT,	
Plaintiffs,	) )
VS.	) No. 2:23-CV-00123-DCLC-CRW
UNICOI COUNTY, TENNESSEE,	)
CITY OF ERWIN, TENNESSEE,	)
MICHAEL HENSLEY,	)
JONATHAN "FRANK" ROGERS,	)
TONY BUCHANAN,	)
RON ARNOLD,	)
CHAD RICKER,	)
ANTHONY BUCKNER,	)
CLAUDE HENSLEY,	)
BRIAN TRESSLER,	)
ROBERT BULLINGTON,	)
R. MITCHELL MANUEL, and	)
JOHN and JANE DOES NO. 1-10,	)
	)
Defendants.	)

## ANSWER OF BRIAN TRESSLER AND ROBERT BULLINGTON TO PLAINTIFFS' FOURTH AMENDED COMPLAINT

Defendants, **BRIAN TRESSLER and ROBERT BULLINGTON** [collectively, "these Defendants" (or "Mr. Tressler" or "Mr. Bullington")], by and through counsel, state the following in response to Plaintiffs' Fourth Amended Complaint ["Complaint"]:

1. These Defendants deny the allegations of Paragraph No. 1 of the Complaint to the extent those allegations are addressed to them.

Page 1 of 23

- 2. These Defendants deny the allegations of Paragraph No. 2 of the Complaint to the extent those allegations are addressed to them.
- 3. These Defendants deny the allegations of Paragraph No. 3 of the Complaint to the extent those allegations are addressed to them.
- 4. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 4 of the Complaint.
- 5. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 5 of the Complaint.
- 6. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 6 of the Complaint.
- 7. The allegations contained in Paragraph No. 7 of Complaint are admitted based upon the knowledge of these Defendants.
- 8. The allegations contained in Paragraph No. 8 of the Complaint are admitted based upon the knowledge of these Defendants.
- 9. The allegations contained in Paragraph No. 9 of the Complaint are admitted based upon the knowledge of these Defendants.
- 10. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 10 of the Complaint.
- 11. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 11 of the Complaint.
- 12. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 12 of the Complaint.

Page 2 of 23

- 13. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 13 of the Complaint.
- 14. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 14 of the Complaint.
  - 15. The allegations contained in Paragraph No. 15 of the Complaint are admitted.
  - 16. The allegations contained in Paragraph No. 16 of the Complaint are admitted.
- 17. The allegations contained in Paragraph No. 17 of the Complaint are admitted based of the knowledge of these Defendants.
- 18. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 18 of the Complaint.
- 19. The allegations contained in Paragraph No. 19 of the Complaint do not require a response.
- 20. In response to the allegations of Paragraph No. 20 of the Complaint, these Defendants do not dispute that the Court has subject matter jurisdiction but deny Plaintiffs have any valid cause of action against these Defendants.
- 21. In response to the allegations of Paragraph No. 21 of the Complaint, these Defendants do not dispute that the Court has personal jurisdiction over the various Defendants in this matter but deny that Plaintiffs have any valid cause of action against these Defendants.
- 22. In response to the allegations of Paragraph No. 22 of the Complaint, these Defendants do not dispute that the Court has personal jurisdiction over them but deny that Plaintiffs have any valid cause of action against these Defendants.
  - 23. In response to the allegations of Paragraph No. 23 of the Complaint, these Defendants

Page 3 of 23

do not dispute that venue is proper but deny that Plaintiffs have any valid cause of action against these Defendants.

- 24. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 24 of the Complaint.
- 25. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 25 of the Complaint.
- 26. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 26 of the Complaint.
- 27. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 28 of the Complaint.
- 28. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 29 of the Complaint.
- 29. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 29 of the Complaint.
- 30. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 30 of the Complaint.
- 31. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 31 of the Complaint.
- 32. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 32 of the Complaint.
- 33. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 33 of the Complaint.

Page 4 of 23

- 34. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 34 of the Complaint.
- 35. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 35 of the Complaint.
- 36. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 36 of the Complaint.
- 37. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 37 of the Complaint.
- 38. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 38 of the Complaint.
- 39. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 39 of the Complaint.
- 40. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 40 of the Complaint.
- 41. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 41 of the Complaint.
- 42. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 42 of the Complaint.
- 43. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 43 of the Complaint.
- 44. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 44 of the Complaint. These Defendants likewise deny they are participants in any

Page 5 of 23

conspiracy (see Paragraph No. 44(c) referencing "participants in the conspiracy").

45. These Defendants lack sufficient information to admit or deny the allegations of

Paragraph No. 45 of the Complaint.

46. These Defendants lack sufficient information to admit or deny the allegations of

Paragraph No. 46 of the Complaint.

47. These Defendants lack sufficient information to admit or deny the allegations of

Paragraph No. 47 of the Complaint.

48. These Defendants lack sufficient information to admit or deny the allegations of

Paragraph No. 48 of the Complaint.

49. These Defendants lack sufficient information to admit or deny the allegations of

Paragraph No. 49 of the Complaint.

50. These Defendants lack sufficient information to admit or deny the allegations of

Paragraph No. 50 of the Complaint.

51. These Defendants lack sufficient information to admit or deny the allegations of

Paragraph No. 51 of the Complaint.

52. These Defendants lack sufficient information to admit or deny the allegations of

Paragraph No. 52 of the Complaint nor do they admit that "Jerry Puckett" is well known to them as

being the appointed custodian for "Andrew."

53. These Defendants lack sufficient information to admit or deny the allegations of

Paragraph No. 53 of the Complaint. Likewise, these Defendants deny that they were part of some

sort of malicious prosecution scheme or malicious prosecution conspiracy against any member of

the Puckett family.

Page 6 of 23

- 54. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 54 of the Complaint.
- 55. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 55 of the Complaint.
- 56. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 56 of the Complaint.
- 57. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 57 of the Complaint.
- 58. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 58 of the Complaint.
- 59. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 59 of the Complaint.
- 60. In response to the allegations contained in Paragraph No. 60 of the Complaint, these Defendants lack sufficient information to admit or deny the claim that Plaintiff George Puckett was properly detained as a juvenile offender.

Concerning the allegations contained in Paragraph No. 60(a), these Defendants admit that a person they later learned was Plaintiff George Puckett lost control of an ATV and hit Mr. Tressler's fence. However, the ATV also ran through the fence and made contact with and caused damage to a barn. The allegation that the damage was no more than \$50.00 is denied. These Defendants lack sufficient information to admit or deny the claims that Plaintiff George Puckett "borrowed" the ATV or "took a hard bump to the head during the incident and sustained a serious head injury and/or concussion."

Page 7 of 23

Concerning the allegations contained in Paragraph No. 60(b) of the Complaint, these Defendants deny that Plaintiff George Puckett located Mr. Tressler, the property owner, within minutes of the crash. Rather, Mr. Tressler was working outside and witnessed the crash. It is admitted that Plaintiff George Puckett left the scene and started walking down the roadway. The remaining allegations contained in Paragraph No. 60(b) are denied.

These Defendants lack sufficient information to admit or deny the allegations contained in Paragraph No. 60(c).

These Defendants lack sufficient information to admit or deny the allegations contained in Paragraph No. 60(d).

These Defendants lack sufficient information to admit or deny the allegations contained in Paragraph No. 60(e).

- 61. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 61 of the Complaint.
- 62. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 62 of the Complaint.
- 63. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 63 of the Complaint.
- 64. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 64 of the Complaint.
- 65. These Defendants admit the allegations contained in the first two sentences of ParagraphNo. 65 of the Complaint.

These Defendants lack sufficient information to admit or deny the allegations contained in

Page 8 of 23

Paragraph No. 60(a).

These Defendants lack sufficient information to admit or deny the allegations contained in

Paragraph No. 60(b) except it is denied that Mr. Tressler testified that Plaintiff George Puckett

notified him of the crash within minutes of its occurrence.

These Defendants lack sufficient information to admit or deny the allegations contained in

Paragraph No. 60(c).

These Defendants lack sufficient information to admit or deny the allegations contained in

Paragraph No. 60(d).

66. These Defendants lack sufficient information to admit or deny the allegations of

Paragraph No. 66 of the Complaint but they do admit that Plaintiff George Puckett was found guilty

of the offenses.

67. These Defendants lack sufficient information to admit or deny the allegations of

Paragraph No. 67 of the Complaint although they would admit there were several court dates.

68. These Defendants lack sufficient information to admit or deny the allegations of

Paragraph No. 68 of the Complaint.

69. These Defendants lack sufficient information to admit or deny the allegations of

Paragraph No. 69 of the Complaint although they were aware that some sort of punishment may have

been imposed.

70. These Defendants lack sufficient information to admit or deny the allegations of

Paragraph No. 70 of the Complaint.

71. These Defendants lack sufficient information to admit or deny the allegations of

Paragraph No. 71 of the Complaint.

Page 9 of 23

- 72. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 72 of the Complaint.
- 73. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 73 of the Complaint.
- 74. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 74 of the Complaint.
- 75. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 75 of the Complaint.
- 76. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 76 of the Complaint.
  - 77. The allegations contained in Paragraph No. 77 of the Complaint require no answer.
- 78. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 78 of the Complaint.
- 79. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 79 of the Complaint.
- 80. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 80 of the Complaint.
- 81. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 81 of the Complaint.
- 82. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 82 of the Complaint.
  - 83. These Defendants lack sufficient information to admit or deny the allegations of

Page 10 of 23

Paragraph No. 83 of the Complaint.

- 84. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 84 of the Complaint.
- 85. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 85 of the Complaint.
- 86. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 86 of the Complaint.
- 87. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 87 of the Complaint.
- 88. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 88 of the Complaint.
- 89. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 89 of the Complaint.
- 90. These Defendants lack sufficient information to admit or deny the allegations of Paragraph No. 90 of the Complaint.
- 91. The allegations contained in Paragraph No. 91 are admitted to the extent that Mr. Tressler contacted Sheriff Hensley by cell phone. Mr. Tressler did not use the name "George Puckett" when he spoke to Sheriff Hensley. These Defendants also admit that Mr. Tressler did not tell Sheriff Hensley that the driver of the ATV seemed to be a threat to others. These Defendants deny the remaining allegations of Paragraph No. 91.
- 92. The allegations contained in Paragraph No. 92 of the Complaint are denied as stated. It should be noted, however, that these Defendants witnessed Robert Metcalf pick-up Plaintiff George

Page 11 of 23

Puckett.

93. These Defendants lack sufficient information to admit or deny the allegations of

Paragraph No. 93 of the Complaint.

94. These Defendants lack sufficient information to admit or deny the allegations of

Paragraph No. 94 of the Complaint.

95. These Defendants lack sufficient information to admit or deny the allegations of

Paragraph No. 95 of the Complaint.

96. These Defendants lack sufficient information to admit or deny the allegations of

Paragraph No. 96 of the Complaint.

97. These Defendants lack sufficient information to admit or deny the allegations of

Paragraph No. 97 of the Complaint.

98. These Defendants lack sufficient information to admit or deny the allegations of

Paragraph No. 98 of the Complaint.

99. These Defendants lack sufficient information to admit or deny the allegations of

Paragraph No. 99 of the Complaint.

100. These Defendants lack sufficient information to admit or deny the allegations of

Paragraph No. 100 of the Complaint.

101. These Defendants lack sufficient information to admit or deny the allegations of

Paragraph No. 101 of the Complaint.

102. The allegations contained in Paragraph No. 102 of the Complaint are not addressed to

these Defendants and fail to state a claim as to these Defendants.

103. The allegations contained in Paragraph No. 103 of the Complaint are not addressed to

Page 12 of 23

104. The allegations contained in Paragraph No. 104 of the Complaint are not addressed to

these Defendants and fail to state a claim as to these Defendants.

105. The allegations contained in Paragraph No. 105 of the Complaint are not addressed to

these Defendants and fail to state a claim as to these Defendants.

106. The allegations contained in Paragraph No. 106 of the Complaint are not addressed to

these Defendants and fail to state a claim as to these Defendants.

107. The allegations contained in Paragraph No. 107 of the Complaint are not addressed to

these Defendants and fail to state a claim as to these Defendants.

108. The allegations contained in Paragraph No. 108 of the Complaint are not addressed to

these Defendants and fail to state a claim as to these Defendants.

109. The allegations contained in Paragraph No. 109 of the Complaint are not addressed to

these Defendants and fail to state a claim as to these Defendants.

110. The allegations contained in Paragraph No. 110 of the Complaint are not addressed to

these Defendants and fail to state a claim as to these Defendants.

111. The allegations contained in Paragraph No. 111 of the Complaint are not addressed to

these Defendants and fail to state a claim as to these Defendants.

112. The allegations contained in Paragraph No. 112 of the Complaint are not addressed to

these Defendants and fail to state a claim as to these Defendants.

113. The allegations contained in Paragraph No. 113 of the Complaint are not addressed to

these Defendants and fail to state a claim as to these Defendants.

114. The allegations contained in Paragraph No. 114 of the Complaint are not addressed to

Page 13 of 23

115. The allegations contained in Paragraph No. 115 of the Complaint are not addressed to

these Defendants and fail to state a claim as to these Defendants.

116. The allegations contained in Paragraph No. 116 of the Complaint are not addressed to

these Defendants and fail to state a claim as to these Defendants.

117. The allegations contained in Paragraph No. 117 of the Complaint are not addressed to

these Defendants and fail to state a claim as to these Defendants.

118. The allegations contained in Paragraph No. 118 of the Complaint are not addressed to

these Defendants and fail to state a claim as to these Defendants.

119. The allegations contained in Paragraph No. 119 of the Complaint are not addressed to

these Defendants and fail to state a claim as to these Defendants.

120. The allegations contained in Paragraph No. 120 of the Complaint are not addressed to

these Defendants and fail to state a claim as to these Defendants.

121. The allegations contained in Paragraph No. 121 of the Complaint are not addressed to

these Defendants and fail to state a claim as to these Defendants.

122. The allegations contained in Paragraph No. 122 of the Complaint are not addressed to

these Defendants and fail to state a claim as to these Defendants.

123. The allegations contained in Paragraph No. 123 of the Complaint are not addressed to

these Defendants and fail to state a claim as to these Defendants.

124. The allegations contained in Paragraph No. 124 of the Complaint are not addressed to

these Defendants and fail to state a claim as to these Defendants.

125. The allegations contained in Paragraph No. 125 of the Complaint are not addressed to

Page 14 of 23

Filed 03/03/25

126. The allegations contained in Paragraph No. 126 of the Complaint are not addressed to

these Defendants and fail to state a claim as to these Defendants.

127. The allegations contained in Paragraph No. 127 of the Complaint are not addressed to

these Defendants and fail to state a claim as to these Defendants.

128. The allegations contained in Paragraph No. 128 of the Complaint are not addressed to

these Defendants and fail to state a claim as to these Defendants.

129. The allegations contained in Paragraph No. 129 of the Complaint are not addressed to

these Defendants and fail to state a claim as to these Defendants.

130. The allegations contained in Paragraph No. 130 of the Complaint are not addressed to

these Defendants and fail to state a claim as to these Defendants.

131. The allegations contained in Paragraph No. 131 of the Complaint are not addressed to

these Defendants and fail to state a claim as to these Defendants.

132. The allegations contained in Paragraph No. 132 of the Complaint are not addressed to

these Defendants and fail to state a claim as to these Defendants.

133. The allegations contained in Paragraph No. 133 of the Complaint are not addressed to

these Defendants and fail to state a claim as to these Defendants.

134. The allegations contained in Paragraph No. 134 of the Complaint are not addressed to

these Defendants and fail to state a claim as to these Defendants.

135. The allegations contained in Paragraph No. 135 of the Complaint are not addressed to

these Defendants and fail to state a claim as to these Defendants.

136. The allegations contained in Paragraph No. 136 of the Complaint are not addressed to

Page 15 of 23

- 137. The allegations contained in Paragraph No. 137 of the Complaint are not addressed to these Defendants and fail to state a claim as to these Defendants.
- 138. The allegations contained in Paragraph No. 138 of the Complaint are not addressed to these Defendants and fail to state a claim as to these Defendants.
- 139. The allegations contained in Paragraph No. 139 of the Complaint are not addressed to these Defendants and fail to state a claim as to these Defendants.
- 140. The allegations contained in Paragraph No. 140 of the Complaint are not addressed to these Defendants and fail to state a claim as to these Defendants.
- 141. The allegations contained in Paragraph No. 141 of the Complaint are not addressed to these Defendants and fail to state a claim as to these Defendants.
- 142. The allegations contained in Paragraph No. 142 of the Complaint are not addressed to these Defendants and fail to state a claim as to these Defendants.
- 143. The allegations contained in Paragraph No. 143 of the Complaint are not addressed to these Defendants and fail to state a claim as to these Defendants.
- 144. The allegations contained in Paragraph No. 144 of the Complaint are not addressed to these Defendants and fail to state a claim as to these Defendants.
- 145. The allegations contained in Paragraph No. 145 of the Complaint are not addressed to these Defendants and fail to state a claim as to these Defendants.
- 146. The allegations contained in Paragraph No. 146 of the Complaint are not addressed to these Defendants and fail to state a claim as to these Defendants.
  - 147. The allegations contained in Paragraph No. 147 of the Complaint are not addressed to

Page 16 of 23

148. The allegations contained in Paragraph No. 148 of the Complaint are not addressed to

these Defendants and fail to state a claim as to these Defendants.

149. The allegations contained in Paragraph No. 149 of the Complaint are not addressed to

these Defendants and fail to state a claim as to these Defendants.

150. The allegations contained in Paragraph No. 150 of the Complaint are not addressed to

these Defendants and fail to state a claim as to these Defendants.

151. The allegations contained in Paragraph No. 151 of the Complaint are not addressed to

these Defendants and fail to state a claim as to these Defendants.

152. The allegations contained in Paragraph No. 152 of the Complaint are not addressed to

these Defendants and fail to state a claim as to these Defendants.

153. The allegations contained in Paragraph No. 153 of the Complaint are not addressed to

these Defendants and fail to state a claim as to these Defendants.

154. The allegations contained in Paragraph No. 154 of the Complaint are not addressed to

these Defendants and fail to state a claim as to these Defendants.

155. The allegations contained in Paragraph No. 155 of the Complaint are not addressed to

these Defendants and fail to state a claim as to these Defendants.

156. The allegations contained in Paragraph No. 156 of the Complaint are not addressed to

these Defendants and fail to state a claim as to these Defendants.

157. The allegations contained in Paragraph No. 157 of the Complaint are not addressed to

these Defendants and fail to state a claim as to these Defendants.

158. The allegations contained in Paragraph No. 158 of the Complaint are not addressed to

Page 17 of 23

CRW Document 99 Filed 03/03/25 Page 17 of 23 PageID #: 1122

- 159. The allegations contained in Paragraph No. 159 of the Complaint are not addressed to these Defendants and fail to state a claim as to these Defendants.
- 160. The allegations contained in Paragraph No. 160 of the Complaint are not addressed to these Defendants and fail to state a claim as to these Defendants.
- 161. The allegations contained in Paragraph No. 161 of the Complaint are not addressed to these Defendants and fail to state a claim as to these Defendants.
- 162. The allegations contained in Paragraph No. 162 of the Complaint are not addressed to these Defendants and fail to state a claim as to these Defendants.
- 163. The allegations contained in Paragraph No. 163 of the Complaint are not addressed to these Defendants and fail to state a claim as to these Defendants.
- 164. The allegations contained in Paragraph No. 164 of the Complaint are not addressed to these Defendants and fail to state a claim as to these Defendants.
- 165. The allegations contained in Paragraph No. 165 of the Complaint are not addressed to these Defendants and fail to state a claim as to these Defendants.
- 166. The allegations contained in Paragraph No. 166 of the Complaint are not addressed to these Defendants and fail to state a claim as to these Defendants.
- 167. The allegations contained in Paragraph No. 167 of the Complaint are not addressed to these Defendants and fail to state a claim as to these Defendants.
- 168. The allegations contained in Paragraph No. 168 of the Complaint are not addressed to these Defendants and fail to state a claim as to these Defendants.
  - 169. The allegations contained in Paragraph No. 169 of the Complaint are not addressed to

Page 18 of 23

- 170. The allegations contained in Paragraph No. 170 of the Complaint are not addressed to these Defendants and fail to state a claim as to these Defendants.
- 171. The allegations contained in Paragraph No. 171 of the Complaint are not addressed to these Defendants and fail to state a claim as to these Defendants.
- 172. The allegations contained in Paragraph No. 172 of the Complaint are not addressed to these Defendants and fail to state a claim as to these Defendants.
- 173. The allegations contained in Paragraph No. 173 of the Complaint are not addressed to these Defendants and fail to state a claim as to these Defendants.
- 174. In response to the allegations contained in Paragraph No. 174 of the Complaint, these Defendants deny that Plaintiff George Puckett has a any valid claim against these Defendants for Conspiracy to Violate Civil Rights.
  - 175. The allegations contained in Paragraph No. 175 of the Complaint are denied.
  - 176. The allegations contained in Paragraph No. 176 of the Complaint are denied.
  - 177. The allegations contained in Paragraph No. 177 of the Complaint are denied.
  - 178. The allegations contained in Paragraph No. 178 of the Complaint are denied.
  - 179. The allegations contained in Paragraph No. 179 of the Complaint are denied.
- 180. The allegations contained in Paragraph No. 180 of the Complaint are not addressed to these Defendants and fail to state a claim as to these Defendants.
- 181. The allegations contained in Paragraph No. 181 of the Complaint are not addressed to these Defendants and fail to state a claim as to these Defendants.
  - 182. The allegations contained in Paragraph No. 182 of the Complaint are not addressed to

Page 19 of 23

- 183. The allegations contained in Paragraph No. 183 of the Complaint are not addressed to these Defendants and fail to state a claim as to these Defendants.
- 184. The allegations contained in Paragraph No. 184 of the Complaint are not addressed to these Defendants and fail to state a claim as to these Defendants.
- 185. The allegations contained in Paragraph No. 184 of the Complaint are not addressed to these Defendants and fail to state a claim as to these Defendants.
- 186. The allegations contained in Paragraph No. 185 of the Complaint are not addressed to these Defendants and fail to state a claim as to these Defendants.
- 187. The allegations contained in Paragraph No. 187 of the Complaint are not addressed to these Defendants and fail to state a claim as to these Defendants.
- 188. The allegations contained in Paragraph No. 188 of the Complaint are not addressed to these Defendants and fail to state a claim as to these Defendants.
- 189. The allegations contained in Paragraph No. 189 of the Complaint are not addressed to these Defendants and fail to state a claim as to these Defendants.
- 190. The allegations contained in Paragraph No. 190 of the Complaint are not addressed to these Defendants and fail to state a claim as to these Defendants.
- 191. The allegations contained in Paragraph No. 191 of the Complaint are not addressed to these Defendants and fail to state a claim as to these Defendants.
- 192. The allegations contained in Paragraph No. 192 of the Complaint are not addressed to these Defendants and fail to state a claim as to these Defendants.
  - 193. The allegations contained in Paragraph No. 193 of the Complaint are not addressed to

Page 20 of 23

194. The allegations contained in Paragraph No. 194 of the Complaint are not addressed to

these Defendants and fail to state a claim as to these Defendants.

195. In response to the allegations contained in Paragraph No. 195 of the Complaint, these

Defendants deny that they have engaged in any wrongful conduct and deny that Plaintiffs are entitled

to recover any damages from them.

196. In response to the allegations contained in Paragraph No. 196 of the Complaint, these

Defendants deny that they have engaged in any wrongful conduct and deny that Plaintiffs are entitled

to recover any damages from them.

197. In response to the allegations contained in Paragraph No. 197 of the Complaint, these

Defendants deny that they have engaged in any wrongful conduct and deny that Plaintiffs are entitled

to recover any damages from them.

198. In response to the allegations contained in Paragraph No. 198 of the Complaint, these

Defendants deny that they have engaged in any wrongful conduct and deny that Plaintiffs are entitled

to recover any damages from them.

199. In response to the allegations contained in Paragraph No. 199 of the Complaint, these

Defendants deny that they have engaged in any wrongful conduct and deny that Plaintiffs are entitled

to recover any damages from them.

200. In response to the allegations contained in Paragraph No. 200 of the Complaint, these

Defendants also request a jury trial.

201. In response to the allegations contained in Paragraph No. 201 of the Complaint, these

Defendants once again deny that Plaintiffs are entitled to any relief against them.

Page 21 of 23

202. These Defendants deny all other allegations of the Complaint not previously admitted,

denied, or otherwise answered or explained.

203. Affirmative Defense: The Complaint filed herein fails to state a claim against these

Defendants. Specifically, Plaintiffs cannot show that these Defendants and certain law enforcement

officers entered into a conspiracy to interfere with Plaintiff George Puckett's civil rights. Plaintiffs

cannot show that these Defendants even formed a conspiracy amongst themselves. Further, these

Defendants did not commit any overt acts in furtherance of any conspiracy to which proof will be

made. Finally, Plaintiff George Puckett has suffered no actual damages or any deprivation of his civil

rights insofar as these Defendants are concerned.

204. Affirmative Defense: These Defendants rely upon any applicable statute of limitations.

205. Affirmative Defense: Plaintiffs' claims should be barred as as a result of issue and/or

claim preclusion as he was convicted of the offenses associated with the ATV crash.

WHEREFORE, Defendants, BRIAN TRESSLER and ROBERT BULLINGTON, having

fully answered the Fourth Amended Complaint, request that said cause of action be dismissed at the

cost of Plaintiffs and that they have and recover their reasonable attorney's fees. These Defendants

also request a trial by jury in the event the Fourth Amended Complaint is not dismissed. These

Defendants also reserve the right to amend their answer and/or raise additional affirmative defenses

consistent with any orders of this Court and the Federal Rules of Civil Procedure.

Page 22 of 23

Respectfully submitted,

## BRIAN TRESSLER ROBERT BULLINGTON

**BY:** /s

/s/ David L. Leonard

DAVID L. LEONARD

Attorney for Mr. Tressler and Mr. Bullington

Leonard & Hensley, LLP

114 West Summer Street Greeneville, Tennessee 37743 (423) 638-2121 davidleonard@leonardandhensley.com BPR#016792

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Answer to Fourth Amended Complaint was filed electronically on March 3, 2025. Notice of the filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt.

/s/ David L. Leonard

DAVID L. LEONARD

Page 23 of 23

Case 2:23-cv-00123-DCLC-CRW Document 99 Filed 03/03/25 Page 23 of 23 PageID #: 1128